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Filing date: **11/28/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91199728
Party	Plaintiff Minnesota Twins, LLC
Correspondence Address	MEICHELE R MACGREGOR COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES mrm@cll.com,trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
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Date	11/28/2011
Attachments	THETWINSMOTIONONCONSENT.pdf (2 pages)(11016 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 77/958,904
Filed: March 15, 2010
For Mark: THE TWINS and Design
Published in the Official Gazette: November 9, 2010

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MINNESOTA TWINS, LLC,	:
	:
Opposer,	:
	:
v.	:
	:
TAMARA PINEGAR AND KIMBERLEY	:
PINEGAR,	:
Applicants.	:
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Commissioner for Trademarks
Attn: Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

Opposition No. 91199728

**MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the proceedings in this matter for a period of two months, *i.e.*, up to and including **February 2, 2012**. Applicant and Correspondent of Record, Tamara Pinegar, consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made towards the resolution of this matter. Opposer's counsel has prepared and sent a draft agreement to Opposer's in-house counsel for review. The additional time is requested for Opposer's in-house counsel to review the draft agreement, for Opposer's counsel to forward the draft agreement to Applicants' counsel, and for the parties to continue to explore a settlement of this matter.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicants to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicants' time to answer or otherwise respond to the Notice of Opposition. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York
November 28, 2011

Respectfully submitted,

COWAN LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Meichelle R. MacGregor/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on November 28, 2011, I caused a true and correct copy of the foregoing Motion On Consent To Continue Suspension of Proceedings And To Extend Discovery Period If Opposition Is Resumed to be sent via First Class Mail, postage prepaid, to Applicant and Correspondent of Record at the following address: Tamara Pinegar, 1690 Sweet View Court, Henderson, Nevada 89014-7520.

/Meichelle R. MacGregor/
Meichelle R. MacGregor